

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA	*	
	*	
V	*	CRIMINAL ACTION NUMBER
	*	4:20-cr-00027-RSB-CLR
GHALEB ALAMAURY,	*	
	*	UNDER SEAL
Defendant.	*	

MOTION TO APPROVE PROPERTY BOND OR REQUEST FOR HEARING

COMES NOW GHALEB ALAMAURY, by and through undersigned counsel, and moves this Court to approve the real property described and provided by Counsel for Defendant during the April 21, 2020 hearing based on the documents he has furnished to the Court and the prosecution or conduct a hearing regarding the Court's Order setting conditions of release, showing as follows:

On April 21, 2020, Mr. Alamaury pleaded guilty to the Criminal Information filed in the above-styled case. After the plea colloquy, the Court granted Mr. Alamaury's request for bond pending sentencing.

Among the many conditions of bond was "an Appearance Bond in the amount of \$10,000,000.00, which must be secured by a solvent surety and real property. Specifically, the surety must be the Defendant's father and the real property is as described and provided by Counsel for Defendant during the April 21, 2020 hearing in this case." Mr. Alamaury has furnished scores of documents to the Court and the prosecution meeting the terms of this condition

of release.

Notwithstanding that fact, the Court also had a list of several other items required to be furnished in order to approve real property as security for bail bond in a criminal proceeding. As to these additional items, Mr. Alamaury has been unable to obtain a recent appraisal from a licensed property appraiser, certificate of title insurance and statement of insurance company that U.S. has first mortgage, certificate of title and a statement of lien holders agreeing not to advance any further monies or expand or increase their deed until the U.S. obligation has been met.

Mr. Alamaury sent the Government a letter of explanation for his failure to obtain these specific documents. Nevertheless, the Government claims to have serious concerns about assessing value, securing the property, and if necessary foreclosing on the Canadian property.

Mr. Alamaury contends that the documents he has provided to the Court and prosecution meets those concerns. Furthermore, the other very stringent terms of release so greatly minimize the risk of flight that there is almost no chance the Government will ever move to foreclose.

Based on the foregoing, Mr. Alamaury respectfully requests this Honorable Court approve the real property described and

provided by Counsel for Defendant during the April 21, 2020 hearing or hold a hearing to determine if the Court will approve the real property described and provided by Counsel for Defendant during the April 21, 2020 hearing based on the documents he has furnished to the Court and the prosecution.

Respectfully submitted,

s/Steven Berne
STEVEN P. BERNE
ATTORNEY FOR DEFENDANT
GEORGIA BAR NO. 055020

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Suite 100
Atlanta, Georgia 30338
(404) 881-5335

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon counsel of record in this case a copy of the foregoing document via the Electronic Case Filing system of the United States District Court for the Southern District of Georgia or via email.

This ___5___ day of ___May___, 2020.

Respectfully submitted,

s/Steven Berne
STEVEN P. BERNE
ATTORNEY FOR DEFENDANT
GEORGIA BAR NO. 055020

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